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December 22, 2014

USEPA
Region 5
TSCA/PCB Coordinator
77 West Jackson Boulevard
Chicago, IL 60604-3590
Attn: Nate Nemani, L-8J

Re: SPX Corporation former Lindberg Facility
304 Hart Street
Watertown, WI 53094
Revised Report and Cleanup Plan

Gentlemen:

As recently discussed between TRC, SPX's environmental consultant, and USEPA's Nate Nemani, SPX is submitting this revised information to notify and certify to the Agency and all concerned (the EPA Regional Administrator, the Secretary of the WI DNR, Jefferson County, and the City of Watertown) that SPX intends to conduct a "self-implementing on-site cleanup and disposal of PCB remediation waste" for the captioned site.

SPX had previously received EPA's approval for a partial removal of PCB surficially contaminated concrete flooring and encapsulation of other flooring (40 CFR 761.61 (c)) dated 28 March 2011. As discussed, based on the deteriorating condition of the building and in consultation with the City, SPX has decided to demolish the building and all associated structures and completely remediate the facility in accord with 40 CFR 761.61 (a)(3).

Enclosed is documentation covering the nature of the PCB contamination, the summary of procedures and methods for sampling, characterization and analysis, the location and extent of the contamination, and a cleanup plan including schedule, disposal plan and the demolition and remedial approach.

SPX CORPORATION
13320 BALLANTYNE CORPORATE PLACE
CHARLOTTE, NC 28277-2706
UNITED STATES OF AMERICA

www.spx.com

Since we believed that we were close to an EPA approval some time ago, we are asking for an expedited review of this material in order that our demolition and remediation contractor may continue with his work at the site. Should you need any further information please contact our consultant, Dave McNichol of TRC immediately.

Thank you in advance for your attention to this matter.

Very truly yours,

Walter Galacki
Director Environmental
For SPX Corporation, Owner and Operator and Successor in Interest of the former SPX Lindberg site

W/enclosures

CC: Jefferson County Health Department, Environmental Health Section
WI DNR, Remediation and Redevelopment Program
City of Watertown, J.J. Holloway, PE
TRC, Dave McNichol
Nixon Peabody, Al Floro

SELF-IMPLEMENTING ON-SITE CLEANUP AND DISPOSAL OF PCB REMEDIATION WASTE

November 2014
REVISED December 19, 2014

SPX LINDBERG FACILITY,
304 Hart Street, Watertown, WI

TRC Project No.: 218588-0000-0000

SPX Corporation
13320 Ballantyne Corporate Place
Charlotte, NC 28277-2706

Prepared By:

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1.0 INTRODUCTION

1.1 PURPOSE

SPX Corporation (SPX) wishes to perform under 40 CFR 761.61 (a) (3) a *Self-implementing on-site cleanup and disposal of PCB remediation waste* at the SPX Lindberg facility located at 304 Hart Street, Watertown, WI 53094. The entire project also involves the complete demolition and remediation of the facility. SPX had received EPA's approval for a risk-based approach under 40 CFR 761.61(c). See EPA letter dated March 28, 2011.

SPX, however, no longer believes the facility is useful in its' deteriorated condition and now wishes to completely demolish the buildings and remediate the site and seeks, with the help of the City of Watertown, to find a redeveloper. Thus, SPX is seeking EPA's approval under 40 CFR 761.61(a)(3) in order to perform a *Self-implementing on-site cleanup and disposal of PCB remediation waste.*

1.2 BACKGROUND

Delta Consultants, Shoreview, MN has investigated the Lindberg facility for PCBs and has reported on those investigations. EPA's prior approval (March 28, 2011) was based upon that reporting. TRC has been engaged by SPX to manage/oversee the remediation and demolition. As such TRC and SPX are continuing to rely upon Delta's earlier work and their report "Risk-Based Remediation Plan for PCB-Contaminated Concrete" dated August 2, 2010 and (the subsequent modifications and revisions through December 6, 2010) it is incorporated herein. For the reader's convenience and reference the material follows this report.

The PCB contamination observed at the former Lindberg facility is believed to have been from the manufacture of electrical transformers during a period from 1953 until 1971. No spill event nor history has been identified through a historical review as well as interviews with former employees. The primary PCB contamination is of concrete flooring (within the building) and to a lesser extent a small area outside the building which is a small loading/shipping pad and adjacent soils. Notably, the PCB contamination is not at depth in the concrete flooring, thus PCB contamination is not expected in the substrate beneath any flooring. See especially the Figures in the Delta Report.

SPX, in conjunction with the facilities full demolition and remediation, will remove all Asbestos Containing Building Materials (ACM), Universal Waste (batteries, lamps-both florescent and metal-halide, mercury in electrical components, CPUs, etc.), decommission all firewater, electric, gas, water and sewer, remove all oils, lubes, etc. For the demolition all C & D waste will be disposed at the local Subtitle D (Solid Waste) landfill operated by Waste Management and located in Watertown. The ACM is to be transported and disposed at the Pheasant Run Landfill operated by Waste Management and located in Bristol, WI. Universal waste is destined for Mercury Waste Solutions in Union Grove, WI. And, the PCB concrete along with a minor amount of soil (loading pad area) would be manifested and

transported to a Subtitle C (Hazardous Waste) Landfill operated by Heritage Environmental Services located in Roachdale, IN.

2.0 NATURE OF PCB CONTAMINATION

The nature of the contamination is fully described and explained by Delta in their report. The sampling, the analysis, the PCB results and the graphic (figures) pattern of PCB contamination is all contained in Section 2 of their report. SPX and TRC are relying on this information for the Cleanup discussion which follows in Section 3. Please see Section 2 of the Delta report for a description of the nature of the contamination.

3.0 CLEAN UP PLAN

The SPX former Lindberg facility had been principally, over its long history, a manufacturer of industrial ovens, furnaces, and environmental test chambers with an associated business office activity. Early in its history the facility had also produced electrical transformers. The PCB contamination at the facility results from its manufacture of electrical transformers. The manufacturing areas were in some cases added buildings and in other cases large rooms or other functional areas within a given building-see figures. SPX will perform a self-implementing clean up resulting in PCB concentrations for the site of less than 0.74 mg/kg. This will allow unlimited use for the remaining land under EPA criteria after all remediation and demolition are completed [40 CFR 761.61(a)(4)(i)(A)]. The site, since it will be cleaned up to less than 0.74 mg/kg PCBs, will only be eligible for unlimited commercial or industrial use (**not residential**) under Wisconsin criteria. Thus the sites future use can only be commercial or industrial. A Deed Notice will be entered recording this environmental land use restriction. The proposed clean up includes the removal of PCB contaminated concrete, the removal of a minor quantity of PCB contaminated soils and a loading pad (only outdoor area), and the transportation and disposal of these materials to a RCRA Subtitle C facility all as more fully described below.

3.1 Bulk PCB Remediation Waste Removal and Disposal

SPX intends to remove all of the concrete flooring shown on Figure 1 as PCB remediation waste. The five areas shown on the Figure will completely and conservatively remove and dispose of any concrete flooring with a PCB concentration of 50 mg/kg or above. The contractor hired by SPX, Apollo Dismantling, has mobilized to the site and is currently preparing for the demolition and remediation. At the moment Apollo and its subcontractors are removing all ACM, removing all Universal wastes, collecting all lamps and ballasts, and draining and arranging for utility shutoffs and blocks. Once this work is completed Apollo had planned to cut out and remove all of the PCB concrete for Title C Landfill disposal. See schedule below.

The concrete removal will be in all cases to full floor depth. In addition, SPX proposes to remove to the next core location (still locatable) where a measured result is less than 50 mg/kg content. Thus existing measured values and full depth floor removal ensures the cleanup objective is met. The removed flooring will then be manifested, transported and disposed at the Subtitle C landfill operated by Heritage Environmental Services located in Roachdale, Indiana.

Remaining flooring will then be removed from all areas (rooms and/or buildings). The material will be sized and placed in a single on site pile for further use on site, if possible. Prior to any on-site use the pile will be sampled and analyzed to ensure that the material is less than 0.74 mg/kg PCB content. If less than, the material is candidate material for onsite use to fill any basement voids and grade the site after the demolition. Should the any pile material test greater than 0.74 mg/kg it will not be used onsite but will be disposed into a Subtitle D landfill, either for temporary cover or as fill. Thus any PCB concrete

greater than 50 mg/kg (and minor soils quantity) will be disposed at a Subtitle C (Hazardous Waste) facility; any PCB concrete greater than 0.74 mg/kg will be disposed in a Subtitle D (Solid Waste) landfill facility; and, any PCB concrete less than 0.74 mg/kg may be retained for use to fill basement voids onsite and grading-or if an excessive quantity exists, may also be disposed in the same Subtitle D landfill facility.

3.2 SCHEDULE

The schedule is as follows:

ACM removal, 24 Oct-23 Dec/14
PCB remediation waste removal, 15 Jan-28 Feb/15
Lights/ballasts/U waste, 17 Nov-15 Dec/14
Demolition, 5 Jan-28 Feb/15
Site Restoration, Mar-Apr/15

3.3 Verification

Verification sampling will be performed under all five PCB remediation waste removal areas. See Figure 2 for proposed sample locations. ASTM Method D2974 will be used for moisture content and EPA Method 8082 will be used for sample analysis. Reporting will be for the seven congeners required by WI DNR and total PCB. The outdoor excavation will be sampled with 2-sidewalls samples and a bottom invert sample. Any concrete pile proposed for onsite reuse (filling and grading) will be sampled with 6 samples, composited to 2 for analysis.

3.4 Site Restoration

After completion of all the demolition and remediation activities the site will be restored. The front side walk on Hart Street will remain. The voids of former basement areas will be filled with the concrete from the less than 0.74 mg/kg pile (assuming it has been verified as described herein). After the voids are filled fresh stone will be imported to cover the graded concrete areas. The site will be somewhat crowned to allow that no ponding should occur over time. The property will then be idle until redevelopment can be planned and implemented.

4.0 Deed Notice

SPX Corporation will prepare and have entered a Deed Notice which will limit the property uses to commercial and/or industrial only. The use of the property for residential purposes will be prohibited. Full-time commercial or industrial uses will be allowed since the clean up to less than 0.74 mg/kg PCBs meet the criteria for both EPA and WI DNR.

5.0 Certification

SPX Corporation as the Owner and Operator and Successor in Interest of the former SPX Lindberg site hereby certifies and notifies that the site located at:

304 Hart Street, City of Watertown, County of Jefferson, Wisconsin (The former Lindberg facility)

(SPX) is proposing a "self-implementing on-site cleanup and disposal of PCB remediation waste", and as such SPX has engaged Apollo Dismantling Services, LLC of Niagara Falls, NY to perform the remediation and proper disposal of the site PCB remediation waste, further

a complete package of all PCB sampling, analysis, results, maps, and other PCB related documents will be available on site for EPA's inspection anytime throughout the duration of the project. All information will be available electronically in the Apollo field construction trailer located at the site.

6.0 RECORDKEEPING

A file containing all sampling, analysis, results, graphic depictions of results, shipping and manifesting documents including weight tickets and summaries will be created. Several electronic copies of the record compilation will be made. An electronic copy will be forwarded to USEPA Region 5 PCB Coordinator and to WI DNR PCB Section.

Since this is a cleanup to less than 0.74 mg/kg PCB no further environmental actions are anticipated under 40 CFR 761.61.

RISK-BASED REMEDIATION PLAN FOR PCB-CONTAMINATED CONCRETE

SPX LINDBERG FACILITY
304 HART STREET
WATERTOWN, WISCONSIN
DELTA PROJECT NO. 9M0909245

1.0 INTRODUCTION

1.1 Purpose

Delta Consultants (Delta), on behalf of SPX Corporation (SPX), is pleased to present this *Risk-based Remediation Plan for PCB-Contaminated Concrete* for management of polychlorinated biphenyl (PCB)-contaminated concrete at the SPX Lindberg facility located at 304 Hart Street in Watertown, Wisconsin (**Figure 1**). The purpose of this report is to fulfill the application requirements of the Environmental Protection Agency (EPA) Toxic Substance Control Act (TSCA) PCB regulations, 40 CFR 761.61(c) *Risk-based disposal approval* for PCB remediation waste. This report presents the following:

- Site characterization data collected to date;
- Proposed cleanup plan for the facility; and
- Plan for future management of the PCB-contaminated soil and concrete.

Since the proposed cleanup plan includes off-site disposal of PCB remediation waste, engineered controls, and a deed restriction to limit exposure, this Risk-based Remediation Plan is being submitted with the goal of allowing PCB remediation waste to remain at the facility at a concentration of 10 milligrams per kilogram (mg/kg) PCBs.

where to?

Deed details? (Wisc.? County

1.2 Background Information

The SPX Lindberg facility is located 1,000 feet east of the Rock River and immediately south of the Chicago, Milwaukee, St. Paul and Pacific railroad in Watertown, Jefferson County, Wisconsin (**Figure 1**). The subject property consists of approximately 5.3 acres of land that is occupied by an approximately 174,000 square foot manufacturing and office building. The Subject Property is bordered by a storage warehouse and railroad tracks to the north, a JohnsonDiversey (formerly U.S. Chemical Company) facility to the east, Hart Street and a parking lot to the south, and residential buildings to the west.

The subject property was originally developed in the early 1920s as a woodworking/ manufacturing facility. The majority of the current building infrastructure was constructed in the 1950s, when it was occupied by Hevi-Duty Electric Company, a manufacturer of electrical transformers, heat treating furnaces, and hot plates. According to historical documents, the combined operations of transformer and furnace manufacturing were moved to Watertown, Wisconsin in 1953. In 1962, a limited portion of the Watertown facility produced the larger transformers with a maximum rating of 2000 KVA. All transformer production at the facility ended in 1971.

According to nonresponsi, former manufacturing supervisor at the facility and facility employee since 1973, recent operations consisted of the manufacture of a wide array of industrial ovens, refrigeration units, environmental test chambers, industrial manufacturing furnaces, and custom products. Manufacturing operations were terminated at the facility in late 2005. The facility is currently unoccupied and largely vacant and is being placed on the market for sale. The potential future facility use is anticipated to remain industrial.

No PCB releases have been reported or are known to have occurred within the facility. The presence of PCB-contaminated concrete was discovered during routine Phase II Environmental Assessment (EA) activities performed on October 1, 2009, prior to SPX placing the facility up for sale. Sampling activities were performed to evaluate for the potential presence of PCBs on the concrete floor surface. Surface wipe sampling was performed in an approximate 60-foot square-based grid pattern throughout the facility. Of the 49 surface wipe samples collected during the initial testing, five samples indicated PCB concentrations greater than 10 micrograms (µg) per 100 square centimeters (cm^2) total PCBs.

2.0 NATURE OF CONTAMINATION

Between October 2009 and May 2010, Delta has performed six PCB delineation events at the SPX Lindberg facility to assess the extent and magnitude of PCBs on top of and within the concrete floor. These sampling events included both PCB wipe and bulk concrete sampling and occurred on October 1, October 27, and December 28-30, 2009 and January 25-28, March 16-April 2, and May 4-11, 2010. Photographs taken during the sampling events are presented in **Appendix A**.

2.1 PCB Wipe Sampling

In order to initially characterize the horizontal extent of PCBs on the concrete floor surface, a PCB wipe sampling program was performed. A total of 72 wipe samples were collected from the floor in an approximate 60-foot square-based grid pattern throughout the facility. The sample locations are shown on **Figure 2**. No floor coverings were compromised during sample collection; sample locations which were proposed in areas covered with carpeting were moved to the nearest non-carpeted area.

The wipe samples were collected using hexane-preserved sorbent pads provided by Pace Analytical Services, Inc. (Pace). The procedure for obtaining a wipe sample for PCB analysis consisted of rubbing the hexane-soaked pad within a 10 cm by 10 cm (100 cm^2) sample area, using a prescribed wiping pattern that followed the horizontal and vertical axes of the area. The pad was then placed into a 4-ounce amber glass container and the cover was secured tightly on the jar. The wipe samples were submitted to Pace for analysis for PCBs by EPA Method 8082. Laboratory analytical reports for the wipe samples are presented in **Appendix B**.

Analytical results for surface wipe samples are summarized on **Table 1** and **Figure 2**. PCB concentrations ranged from less than the laboratory reporting limit of 1.0 µg per 100 cm^2 to 59.7 µg/100 cm^2. The PCB concentrations were compared against the TSCA PCB surface cleanup standard of 10 µg/100 cm^2. Twenty-six of the wipe samples did not indicate the presence of PCBs. Thirty-six wipe samples contained PCBs at concentrations between 1 and 10 µg/100 cm^2. Ten wipe samples indicated PCB concentrations greater than 10 µg/100 cm^2. These samples included:

26
36
10

- B1 (59.7 µg/100 cm^2) and W3 (13.0 µg/100 cm^2), located near the northeast corner of the "Big Bay" area in the vicinity of a loading area;
- W5 (11.7 µg/100 cm^2), B4 (23.7 µg/100 cm^2), W9 (14.4 µg/100 cm^2), B6 (23.2 µg/100 cm^2), and W10 (10.8 µg/100 cm^2), located along the "Heavy Assembly Materials" storage corridor;
- B7 (11.5 µg/100 cm^2) and W33 (12.4 µg/100 cm^2), located south of the "Heavy Assembly Materials" storage corridor near the old shipping office; and
- A8 (10.4 µg/100 cm^2), located in a loading dock area near the southwest corner of the facility.

According to nonresp, the "Heavy Assembly Materials" area, an approximately 16-foot wide by 315-foot room located in the west-central portion of the facility, was formerly used

as a staging area for parts and equipment prior to being moved into the product assembly rooms.

2.2 PCB Bulk Concrete Sampling

In order to evaluate whether PCBs have penetrated the concrete floor, 585 bulk concrete samples were collected from 406 locations throughout the facility. The locations of these samples are shown on **Figure 3**.

- Concrete samples B1, B4, B6, B7, and A8 were collected at five locations previously sampled using PCB wipe sampling techniques and exhibiting PCB concentrations exceeding the surface standard of 10 µg/100 cm^2 PCBs.
- Concrete samples 1 through 36 were collected within three areas (the northwest loading area, the southwest loading dock, and the "Heavy Assembly Materials" corridor) previously sampled using PCB wipe sampling techniques and exhibiting PCB concentrations exceeding the surface standard of 10 µg/100 cm^2 PCBs.
- Concrete samples 37 through 171 were collected at approximately 10-foot intervals to expand on the areas where PCB impacted concrete was previously identified at concentrations greater than the bulk concrete standard of 1 mg/kg PCBs.
- Concrete samples 172 through 273 were collected at approximately 20-foot intervals to expand on the areas where PCB impacted concrete was previously identified at concentrations greater than the bulk concrete standard of 1 mg/kg PCBs.
- Concrete samples 274 through 401 were collected at approximately 20-foot intervals throughout the remaining manufacturing portions of the facility.

All manufacturing areas of the facility were sampled with the exception of an 11,000-square foot room in the eastern side and a 1,600-square foot room on the northern side. According to nonresp, the room on the eastern side was constructed circa 1978, which was after the date that transformer production ended at the facility (1971), and was used for oven assembly. The room to the north was added in the early 1990s and was used as a cutting room.

Bulk concrete samples were collected in general accordance with EPA Region 1 *Standard Operating Procedure for Sampling Concrete in the Field* (December 30, 1997). The sample holes were advanced using a hand-held rotary hammer/impact drill equipped with 1-inch and ½-inch masonry bits. The 0-1 inch sample was collected by advancing a hole into the concrete to a depth of one inch using the 1-inch bit. Concrete dust generated from the

drilling of the sample interval was collected using clean disposable sampling tools and placed into a sample jar. The drill hole was vacuumed thoroughly to prevent cross-contamination between sampling intervals. The hole was further advanced to a depth of either 3 (or 4) inches using the ½-inch bit and the concrete dust was collected for the 1-3 (or 2-4) inch sample. The drill bits were decontaminated between holes using a soap and water solution and potable water rinse. Three to four holes were advanced at each sample location to obtain a sufficient sample weight for analysis. The bulk concrete samples were submitted for laboratory analysis for PCBs by EPA Method 8082. Laboratories utilized throughout this project include Pace Analytical Services (Minneapolis, Minnesota), TestAmerica (Watertown, Wisconsin), and New Age/Landmark Mobile Analytical Services (New Haven, Michigan). Laboratory analytical reports for the bulk concrete samples are presented in **Appendix C**.

Analytical results for the bulk concrete samples are summarized on **Table 2** and **Figures 4 and 5**. PCBs were detected throughout the manufacturing portion of the facility. PCB concentrations in the bulk concrete samples ranged from below the detection limit to 3,310 mg/kg.

The bulk concrete sample PCB concentrations were compared against the EPA cleanup level of 1 mg/kg PCBs for bulk remediation waste in high occupancy (an average of 6.7 hours or more a week) areas. Of the 406 near-surface (0 to 1 inch deep) concrete samples collected, 294 samples exhibited PCB concentrations above 1 mg/kg PCBs. Deeper samples (1 to 3 inches deep or 2 to 4 inches deep) were collected from 177 of these locations. PCB concentrations were observed to decrease with depth at 176 of the 177 locations, with only 19 of the deeper samples exhibiting PCB concentrations above 1 mg/kg PCBs.

Two locations which exhibited PCB concentrations above 1 mg/kg PCBs at a depth of 1 to 3 inches were sampled from a depth of 3 to 6 inches. Concrete 31, located in the northwest loading area, contained 3,310 mg/kg PCBs in the 0 to 1 inch deep sample and 1,440 mg/kg in the 1 to 3 inch deep sample. No PCBs were detected in the bulk concrete sample collected at a depth of 3 to 6 inches (reporting limit of 0.1 mg/kg for each Aroclor). Concrete sample B6, located near the center of the "Heavy Assembly Materials" area, contained 7.53 mg/kg PCBs in the 0 to 1 inch deep sample and 2.49 mg/kg in the 1 to 3 inch deep sample. No PCBs were detected in the bulk concrete sample collected at a depth of 3 to 6 inches (reporting limit of 0.1 mg/kg for each Aroclor).

Bulk concrete samples were collected from 3 areas located on the outside of the facility: the loading ramp near the southwest corner; the truck ramp located on the east side; and the rail spur loading area on the north side. Four of the six samples collected from the rail spur loading area (Concrete 36, 39, 40, and 41) contained PCBs at concentrations exceeding 1 mg/kg PCBs. None of the samples collected from the other two areas contained PCBs at concentrations above 1 mg/kg PCBs.

3.0 CLEANUP PLAN

The SPX Lindberg facility is a manufacturing and office building. PCB-contaminated concrete is present throughout the manufacturing portion of the facility. Should a self-implementing cleanup be conducted, a cleanup level for bulk PCB remediation waste of ≤1 mg/kg would be required without further conditions per 40 CFR 761.61(a)(4)(i)(A). However, an alternative, risk-based cleanup level may be used, pending EPA approval, in accordance with 40 CFR 761.61(c). Based on preliminary conversations with personnel from EPA Region 5 and the Wisconsin Department of Natural Resources (WDNR), a risk-based cleanup level of ≤10 mg/kg PCBs may be an acceptable site-specific cleanup level for this facility.

A quantitative human health or environmental risk assessment has not been conducted. With the exception of the concrete pad in the rail spur loading area, the PCB contamination is located within the confines of the facility building. Vertical bulk concrete sampling results demonstrate that the PCBs have not penetrated the concrete floor to the underlying soil. Since the contaminated areas which will remain at the property following the proposed cleanup are confined within the physical enclosure of the building, no associated risks to the environment are anticipated. Access to the contaminated areas is provided by entrance doors which are currently locked. Under potential future use conditions, the anticipated use of the building is industrial. The potential occupational exposure in this scenario stems primarily from dermal contact with the contaminated floor.

The proposed site cleanup presented below includes off-site disposal, engineered controls, and a deed restriction to limit exposure. Based on its industrial use and limited accessibility, a risk-based cleanup level of ≤10 mg/kg is being requested for this facility. Approximately 20,650 square feet of concrete contains PCBs at concentrations greater than 10 mg/kg (**Figure 6**).

The following remediation methods are proposed for the facility in order to address the PCBs at concentrations greater than 10 mg/kg:

- Bulk PCB Remediation Waste removal and off-site disposal of the 700 square-foot concrete pad in the rail spur loading area.
- Continued Use Authorization, which includes cleaning per Subpart S and two coats of epoxy, for the in-place management of 12,150 square feet of PCB-contaminated, bare concrete flooring.
- Continued Use Authorization, which includes superficial cleaning and two coats of epoxy, for the in-place management of 7,000 square feet of PCB-contaminated, epoxy-coated concrete flooring.
- Cleaning per Subpart S for the in-place management of approximately 800 square-feet of PCB-contaminated concrete flooring located at 8 non-contiguous locations.

The locations within the facility proposed to be cleaned by these remediation methods are shown in **Figure 7**.

3.1 Bulk PCB Remediation Waste Removal and Disposal

A 16-foot by 43-foot concrete pad located in the in the rail spur loading area to the north the facility building was found to contain PCBs at concentrations greater than 10 mg/kg (**Figure 7; Appendix A, Photograph 1**). A bulk concrete sample collected from Concrete 36 contained 201 mg/kg PCBs in the 0 to 1 inch sample interval. In order to manage the PCBs in this area, SPX will remove the entire concrete pad in accordance with 40 CFR 761.61(a)(5)(i). The bulk PCB remediation wastes will be managed and disposed off-site according to the applicable waste classification and disposal regulations as specified under 40 CFR 761.61(a)(5)(i)(B)(2).

Following removal of the concrete pad, a confirmation sample will be collected from the soil beneath the location of Concrete 36. This sample will be analyzed for PCBs by EPA Method 8082. A bulk concrete sample previously collected from Concrete 36 contained 2.29 mg/kg PCBs in the 1 to 3 inch sample interval. Bulk concrete samples collected from the other five locations in the concrete pad did not detect the presence of PCBs at a depth of 1 to 3 inches, so no additional confirmation sampling will be performed beneath the concrete pad.

3.2 Continued Use Authorization

The 40 CFR 761.30(p) *continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs* authorization will be implemented for the in-place management of 19,150 square feet of PCB-contaminated concrete located within the facility. The proposed cleanup level for the work described in this section is ≤10 mg/kg PCBs.

The proposed cleanup area has been subdivided into two distinct areas with respect to the surface condition of the concrete. The first area consists of 12,150 square feet of bare concrete flooring stretching from the north end of the facility to approximately 440 feet to the south, including the loading dock located on the west side of the building (**Figure 7; Appendix A, Photographs 2 through 5 and 8**). The second area consists of a 7,000-square foot former assembly area near the southern end of the facility (**Figure 7; Appendix A, Photographs 6 and 7**). The floor in this area is covered with a white epoxy coating.

none @ present

3.2.1 PCB Source Control

The first step of implementing the 761.30(p) continued use authorization requires the removal of the source causing the release of PCBs. No PCB releases have been reported or are known to have occurred within the facility. The results of the investigation discussed above do not indicate a point source of the PCB contamination. The results of a Phase I Environmental Site Assessment (EA) performed at the facility indicated the potential historical presence of PCBs related to the former manufacture of electrical transformers at the facility. According to information presented in the EA report, dated September 23, 2009:

> *The second suspect REC consists of the former manufacture of electric transformers at the Subject Property by the Hevi-Duty Company in the 1950's. Historically, manufacturers of transformers were known to employ dielectric fluids containing polychlorinated biphenyls (PCBs). This condition is characterized as a suspect REC since no direct evidence in the form of spills or releases of transformer fluids are known, nor have any indications of the use of PCB-containing fluids been directly identified at the Subject Property. However, the manufacturing of electric transformers at the Subject Property is indicated in a 1956 Sanborn map and the Hevi-Duty Company is known to have historically used PCB containing transformer fluids at other facility locations in the United States.*

Recognized Env. Concern (REC)

Information regarding Hevi-Duty Company historical operations was obtained from the SolaHD website (http://www.solaheviduty.com). According to the company's historical summary, the combined operations of transformer and furnace manufacturing were moved

to Watertown, Wisconsin in 1953. In 1962, a limited portion of the Watertown facility produced the larger transformers with a maximum rating of 2000 KVA. All transformer production at the facility ended in 1971.

3.2.2 Decontamination and Coating Methods

Prior to the initiation of cleanup activities at the facility, all moveable equipment and materials will be removed from the areas to be cleaned. The 12,150 square feet of bare, PCB-contaminated concrete floor will be cleaned in accordance with the double wash/rinse procedure described in 40 CFR 761 Subpart S. This procedure is intended for the decontamination of non-porous surfaces, but 761.30(p) requires that this method be used to prepare PCB-contaminated concrete for encapsulation. Following an initial vacuum to remove loose dust and bird waste, the surface washing steps in this area will include 1) high-pressure steam wash with concrete cleaner/degreaser, 2) potable water rinse, 3) power scrub with a cleaning/degreasing and muriatic acid etchant solution, and 4) high-pressure steam rinse.

The 7,000 square feet of epoxy-coated, PCB-contaminated concrete floors will be cleaned in a manner less stringent that the double wash/rinse procedure. The reason for this is that while bulk concrete samples collected from below the epoxy-coated surface in this area contained elevated levels of PCBs, wipe samples taken from the top of the epoxy-coated surface did not exhibit PCBs above 10 µg/100 cm^2. Following an initial vacuum to remove loose dust and bird waste, the surface washing steps in this area will include a 1) high-pressure steam wash with concrete cleaner/degreaser, 2) a light scuffing of the epoxy-coated surface with 100+ grit sandpaper, and 3) a final vacuum and rinse.

Following the surface washing activities and once the surface has been allowed to dry for a minimum of 24 hours, an epoxy encapsulant will be placed on the concrete surface according to the requirements of 40 CFR 761.30(p)(1)(iii)(A). Two coats of epoxy will be applied to the floor surface. The two coats of epoxy will consist of contrasting colors so that any wearing of the topcoat can be detected. In the area where a white epoxy coating already exists, one additional coat will be applied in a contrasting color.

Once the epoxy has dried, labels will be placed on the encapsulated floor surfaces to indicate that PCBs remain in the underlying concrete as specified under 40 CFR

761.30(p)(1)(iii)(B). The labels, described in 761.45, will be applied at the entrances, corners, and central portions of the encapsulated area.

3.2.3 Disposal

Wastes generated during the double wash/rinse procedure and encapsulation may include water mixed with detergent, water mixed with spent degreaser, used absorbent materials, and other equipment. These wastes will be managed according to applicable waste classification and disposal regulations as specified under 40 CFR 761.378(c). ok

3.3 Subpart S Cleaning

Besides the 19,150 square feet of PCB-contaminated concrete described above, there were eight non-contiguous concrete sample locations exhibiting PCB concentrations greater than 10 mg/kg (**Figure 7**). These locations include the following:

- Concrete 53 - 12.67 mg/kg PCBs at 0-1 inch, 1.06 mg/kg PCBs at 1-3 inches (Wipe B5 had 2.0 µg/100 cm^2 PCBs),
- Concrete 103 – 40.0 mg/kg PCBs at 0-1 inch, non-detect at 1-3 inches,
- Concrete 178 – 11.00 mg/kg PCBs at 0-1 inch (Wipe A7 had 4.6 µg/100 cm^2 PCBs),
- Concrete 230 – 11.50 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches (Wipe C3 had 5.6 µg/100 cm^2 PCBs),
- Concrete 239 – 22.0 mg/kg PCBs at 0-1 inch, (Wipe C6 was non-detect),
- Concrete 252 – 11.0 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches,
- Concrete 272 – 10.3 mg/kg PCBs at 0-1 inch, non-detect at 2-4 inches (Wipe C4 had 4.5 µg/100 cm^2), and
- Concrete 370 – 16.0 mg/kg PCBs at 0-1 inch.

Given the limited areal and vertical extent of PCBs in these eight locations, the Subpart S double wash/rinse procedure will be used to decontaminate the shallow concrete. A 10-foot by 10-foot (100-square foot) area surrounding each sample location will be cleaned using the method for bare floors as described in **Section 3.2.2**. Following the surface washing activities, confirmation bulk concrete samples will be collected from 0 to 1 inch in each of these areas and analyzed for PCBs by EPA Method 8082. Should the sample result indicate a PCB concentration of ≤10 mg/kg, the cleanup will be considered complete. If the sample result should indicate a PCB concentration greater than 10 mg/kg PCBs, an epoxy encapsulant will be placed on the 100 square-foot area as described in **Section 3.2.2**.

3.4 Schedule

It is anticipated that the cleanup will begin within approximately one month of EPA authorization and will take approximately one month to complete. The following is an estimated timeline to complete the site cleanup:

Item	*Date*
EPA Approval	*October 2010*
Initiate Site Cleanup	*November 2010*
Complete Site Cleanup	*December 2010*
Reporting and Deed Restriction Filing	*February 2011*

4.0 RECORDKEEPING

As requested in 40 CFR 761.61(a)(3)(i)(E), a file containing all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess the PCB contamination at the facility will be maintained at the facility and will be available for EPA inspection. The written certification, signed by a representative of SPX as both property owner and party conducting the cleanup, will be submitted as a separate document.

Because cleanup activities include the use of an encapsulant and PCB-contaminated concrete will remain at concentrations which exceed the regulatory cleanup levels, a deed restriction will be recorded within 60 days of the completion of the cleanup activities in accordance with 40 CFR 761.61(a)(8)(i). A written certification indicating that the deed restriction has been filed will be submitted to the EPA Regional Manager.

NOTE!

Long-term management of the PCB-affected concrete will be necessary. An operations and maintenance management plan will be developed to maximize employee protection. Components of the management plan will include training information for facility workers to inspect the encapsulant for wear and damage, procedures for repairing the encapsulant as needed, and a safety plan for workers in the event that they need to penetrate the encapsulant and drill into the concrete. The management plan will also include a plan for addressing the ultimate removal and disposal of PCB-contaminated concrete and soil remaining beneath the encapsulant for the point in time when the property is adapted for another use or the building demolished.

5.0 REMARKS

The recommendations contained in this report represent Delta's professional opinions based upon the currently available information and are arrived at in accordance with currently acceptable professional standards. This report is based upon a specific scope of work requested by the client. The contract between Delta and its client, SPX Corporation, outlines the scope of work, and only those tasks specifically authorized by that contract or outlined in this report were performed. This report is intended only for the use of Delta's client and anyone else specifically identified in writing as a user this report. Delta will not and cannot be liable for unauthorized reliance by any other third party. Other than as contained in this paragraph, Delta makes no express or implied warranty as to the contents of this report.

This report was prepared by **DELTA CONSULTANTS.**

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Date: August 11, 2010

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Date: August 11, 2010